

Case	Key Depositions - Trial
Issue Code	Deposition Designations

ROBINSON, GLORIA 3/20/23 VOL 1		
1	005:03 - 005:22	<p>005:03 Q. Ms. Key -- I'm sorry. I knew I was going to</p> <p>04 do that sometime today. Ms. Robinson, will you</p> <p>05 state your name for the record, please?</p> <p>06 A. Gloria Robinson.</p> <p>07 Q. And I don't need your full address, but can</p> <p>08 you tell me which city and state you currently</p> <p>09 reside in?</p> <p>10 A. Greenville, South Carolina.</p> <p>11 Q. And where are you currently giving this</p> <p>12 deposition from?</p> <p>13 A. At home.</p> <p>14 Q. And what city and state is that in?</p> <p>15 A. Greenville, South Carolina.</p> <p>16 Q. And you were at some point employed by</p> <p>17 Dynamic Security?</p> <p>18 A. That's correct.</p> <p>19 Q. How long were you employed by Dynamic</p> <p>20 Security?</p> <p>21 A. Whenever they took over, because I was there</p> <p>22 at Hyundai itself for ten years.</p>
2	006:10 - 006:12	<p>006:10 Q. What locations did you work at when you were</p> <p>11 employed by Dynamic?</p> <p>12 A. I only worked at Hyundai.</p>
3	008:05 - 008:11	<p>008:05 Q. What other locations did you work at for</p> <p>06 Dynamic besides at the Hyundai plant?</p> <p>07 A. That's the only one I worked at. Well, now,</p> <p>08 hold on, because Glovis -- we also had the sister</p> <p>09 Glovis that was right next door to the Hyundai</p> <p>10 plant, and I mean, I had to go and respond to those</p> <p>11 areas, also.</p>
4	013:13 - 013:18	<p>013:13 Q. Yes, ma'am.</p> <p>14 A. Okay. I did not remember Ms. Davita Key, to</p> <p>15 be honest, when I was first contacted in August.</p> <p>16 So once things started going, I still didn't</p> <p>17 remember the entire situation because I've been</p> <p>18 gone for so long.</p>

5	015:07 - 015:12	<p>015:07 Q. What role, if any, would you have had in</p> <p>08 placing Ms. Key in other locations or facilities</p> <p>09 outside of the Hyundai facility?</p> <p>10 A. I would not. She would have gone back to</p> <p>11 the main office, and they would have placed her</p> <p>12 somewhere else.</p>
6	026:22 - 029:16	<p>026:22 EXAMINATION</p> <p>23 BY MS. LEONARD:</p> <p>24 Q. All right. Ms. Robinson, I see today that</p> <p>25 you're wearing your hair styled in a dreadlock</p> <p>027:01 fashion. Is that how your hair was styled when you</p> <p>02 worked at the Hyundai plant for Dynamic Security?</p> <p>03 A. No.</p> <p>04 Q. How was your hair styled at that point?</p> <p>05 A. Oh, my goodness. Oh, let's see. I'm not</p> <p>06 sure if I had cut my hair at that point, so I would</p> <p>07 have an Afro or I would have been wearing -- I'm</p> <p>08 not good at hairstyles. So it would have been like</p> <p>09 a -- not a relaxer. I can't think of the word.</p> <p>10 But it would have been like a short, I don't know,</p> <p>11 real short haircut of some sort.</p> <p>12 Q. All right. When did you stop working for</p> <p>13 Dynamic Security?</p> <p>14 A. That would have been 2017, I believe.</p> <p>15 Q. And why did you --</p> <p>16 A. No --</p> <p>17 (Indiscernible crosstalk.)</p> <p>18 THE DEPONENT: Yeah.</p> <p>19 BY MS. LEONARD:</p> <p>20 Q. Why did you stop working for Dynamic</p> <p>21 Security?</p> <p>22 A. I moved.</p> <p>23 Q. Does Dynamic Security operate in North</p> <p>24 Carolina?</p> <p>25 A. No. I don't know. I didn't transfer to</p> <p>028:01 another Dynamic Security position.</p> <p>02 Q. And why did you move to North Carolina?</p> <p>03 A. I'm actually in South Carolina, and I moved</p> <p>04 because of the situation that I was placed in. So</p> <p>05 I had to leave.</p> <p>06 Q. And what was the situation you were placed</p> <p>07 in?</p>

		<p>08 A. I was banned from HMMA and I found -- they</p> <p>09 put me in a job at UPS, I believe it was, part time</p> <p>10 and my lease was running out. So I packed up and</p> <p>11 left.</p> <p>12 Q. Do you know who made the decision to ban you</p> <p>13 from HMMA?</p> <p>14 A. Cassandra Williams.</p> <p>15 Q. Did anyone share with you why Cassandra</p> <p>16 Williams banned you from HMMA?</p> <p>17 MR. REDMOND: Object to the hearsay.</p> <p>18 THE DEPONENT: She thought that I was a</p> <p>19 threat.</p> <p>20 BY MR. REDMOND:</p> <p>21 Q. Tell me what -- everything you recall about</p> <p>22 the decision made to ban you from HMMA. What</p> <p>23 happened?</p> <p>24 MR. REDMOND: And I'm going to object</p> <p>25 to this to the extent that it is based on</p> <p>029:01 hearsay.</p> <p>02 BY MS. LEONARD:</p> <p>03 Q. You can answer.</p> <p>04 A. Okay. I had sent an email to one of the</p> <p>05 lieutenants, and I asked that individual to let me</p> <p>06 know when somebody calls out or whatever because I</p> <p>07 was working a shift, and he got upset.</p> <p>08 When I left that day, the next thing I know</p> <p>09 Dynamic Security called me or the office manager</p> <p>10 called me or whoever was in there and asked me to</p> <p>11 come. I came to the office probably the next day,</p> <p>12 and she informed me that I was banned from Hyundai.</p> <p>13 Q. And did Dynamic give you any reason as to</p> <p>14 why you had been banned from Hyundai?</p> <p>15 A. I believe the office manager said that</p> <p>16 Cassandra Williams felt that I was a threat.</p>
7	030:03 - 030:18	<p>030:03 Q. Did you threaten anyone at HMMA?</p> <p>04 A. No.</p> <p>05 Q. Do you think HMMA provided false or an</p> <p>06 untrue reason for your removal from Hyundai?</p> <p>07 A. Of course, I'm going to take that personal,</p> <p>08 yes.</p> <p>09 Q. Okay. Did Dynamic do anything to</p> <p>10 investigate whether the reason given for -- by HMMA</p>

		<p>11 for your removal was true?</p> <p>12 A. I do not know, to be honest. I really do</p> <p>13 not know because at that point in time I was just</p> <p>14 asked to go to another position. They put me at</p> <p>15 UPS.</p> <p>16 Q. And when you were put at UPS, did you go</p> <p>17 from a full-time to a part-time position?</p> <p>18 A. That's correct.</p>
8	031:09 - 031:13	<p>031:09 Q. Do you feel that Dynamic did anything to</p> <p>10 protect you from Hyundai's false allegations?</p> <p>11 MR. REDMOND: Object to the relevance.</p> <p>12 THE DEPONENT: I didn't give it a</p> <p>13 second thought.</p>
9	031:15 - 032:04	<p>031:15 Q. Do you have any reason -- oh, you referenced</p> <p>16 before, in response to Mr. Redmond's questions</p> <p>17 about the mail room. Where was the mail room at</p> <p>18 Hyundai?</p> <p>19 A. In the main building of the plant, where the</p> <p>20 president normally stays.</p> <p>21 Q. And when important people like the mayor or</p> <p>22 VIPs came to visit the Hyundai plant, would they go</p> <p>23 into that main building?</p> <p>24 A. That's correct.</p> <p>25 Q. So would the mail room be visible to VIPs</p> <p>032:01 and other people visiting the Hyundai plant?</p> <p>02 A. If they did a tour of the building. I don't</p> <p>03 know if they actually went through it because I</p> <p>04 don't -- I didn't go into that building.</p>
10	032:10 - 034:08	<p>032:10 Q. In response to Mr. Redmond's questions, you</p> <p>11 mentioned that you also had some responsibilities</p> <p>12 for the Glovis facility. Did the Glovis facility</p> <p>13 have a mail room?</p> <p>14 A. No. Well, hold on. I don't know inside the</p> <p>15 building itself. I was only responsible for the</p> <p>16 entrance and the rover that would be out there,</p> <p>17 that's it. Now, what's inside Glovis, I don't</p> <p>18 know, because they were actually -- they were the</p> <p>19 same, but they were a different company.</p> <p>20 Q. What do you mean they were the same but a</p> <p>21 different company?</p> <p>22 A. Well, because what Hyundai would do is</p> <p>23 create the cars and the cars would go over to</p>

		<p>24 Glovis, I guess what they would call buy the cars</p> <p>25 from Hyundai. They had their own team members, and</p> <p>033:01 they had their own rules and regulations over</p> <p>02 there. My only responsibility was to make sure</p> <p>03 that we had the security people available to work</p> <p>04 that site.</p> <p>05 Q. All right. And what jobs were staffed --</p> <p>06 did Dynamic staff at the Glovis site?</p> <p>07 A. That would have been the entrance and the</p> <p>08 rover what they all patrol. That's just the two</p> <p>09 positions there.</p> <p>10 Q. All right.</p> <p>11 A. Oh, I'm sorry. And -- no, there were two</p> <p>12 gate guards. One was at the main building. One</p> <p>13 was at the truck entrance, and one was a rover.</p> <p>14 They would go through.</p> <p>15 Q. All right.</p> <p>16 A. I had to think about that.</p> <p>17 Q. When you were working at the Hyundai</p> <p>18 facility for Dynamic, were you someone who was</p> <p>19 authorized or could receive complaints of</p> <p>20 discrimination from employees?</p> <p>21 A. As an account manager, yes.</p> <p>22 Q. Is that the role that you held in July and</p> <p>23 August of 2017?</p> <p>24 A. That would be -- that should be right.</p> <p>25 Q. And would you agree that in that job, if you</p> <p>034:01 learned that an employee felt they were being</p> <p>02 discriminated against or harassed in a way, you</p> <p>03 must look into it and come to some type of</p> <p>04 resolution?</p> <p>05 A. That's correct.</p> <p>06 Q. What sort of training, if any, did Dynamic</p> <p>07 Security provide you on what you were to do if you</p> <p>08 received a complaint of discrimination?</p>
11	034:19 - 036:01	<p>034:19 THE DEPONENT: That would be to find</p> <p>20 out what the Complaint is and send it</p> <p>21 straight up to my immediate supervisor.</p> <p>22 BY MS. LEONARD:</p> <p>23 Q. Is that training that Dynamic provided to</p> <p>24 you or just your understanding of what you should</p> <p>25 do?</p>

		<p>035:01 A. My understanding.</p> <p>02 Q. Okay. Did Dynamic provide you any training</p> <p>03 on how to receive or investigate complaints of</p> <p>04 discrimination?</p> <p>05 A. I mean, as far as a formal training? No.</p> <p>06 Q. Okay. Did Dynamic communicate anything to</p> <p>07 you as to what would constitute discrimination or</p> <p>08 harassment?</p> <p>09 A. On a formal training type, you know, like a</p> <p>10 classroom? Is that what you mean?</p> <p>11 Q. Yes, ma'am.</p> <p>12 A. Not that I can recall.</p> <p>13 Q. Outside of a classroom in any other informal</p> <p>14 ways, did Dynamic communicate to you what would</p> <p>15 constitute discrimination or harassment?</p> <p>16 A. You're asking me to really think here. Not</p> <p>17 that I can think of, no.</p> <p>18 Q. Do you recall seeing any policies that</p> <p>19 Dynamic had in place prohibiting discrimination or</p> <p>20 harassment?</p> <p>21 A. There were written -- there was a written</p> <p>22 handbook of some sort. Now, that, you know, I</p> <p>23 believe you get that at the office when you first</p> <p>24 come in or something, but there was something</p> <p>25 written down. I just don't know what it was off</p> <p>036:01 the top of my head.</p>
12	036:20 - 037:07	<p>036:20 Q. And when you were referring to the handbook,</p> <p>21 is this the handbook that's given to the security</p> <p>22 officers that's a small book that they're supposed</p> <p>23 to carry with them?</p> <p>24 A. I believe that's it.</p> <p>25 Q. Okay. Did you have any duty to document</p> <p>037:01 when you received a complaint of discrimination?</p> <p>02 A. A duty to document? That would be -- I</p> <p>03 mean, as far as me being told to write it down and</p> <p>04 then send it to my supervisor, is that what you</p> <p>05 mean?</p> <p>06 Q. Correct. Did you have any duty to document</p> <p>07 when you received a complaint of discrimination?</p>
13	037:11 - 037:13	<p>037:11 THE DEPONENT: I would have to always</p> <p>12 send it up. So that would have to be in a</p> <p>13 written, not a verbal.</p>

14	038:02 - 038:08	<p>038:02 Q. Who was Latonya Howell?</p> <p>03 A. Latonya Howell. She would be the other</p> <p>04 individual in the mail room, I believe.</p> <p>05 Q. Was she also a trainer?</p> <p>06 A. Yes. She would -- there was only one person</p> <p>07 at the time in the mail room, so she would have</p> <p>08 been the trainer.</p>
15	038:19 - 039:18	<p>038:19 Q. Isn't it true that on the morning of</p> <p>20 August 1, 2017, Ms. Howell phoned you and stated</p> <p>21 that Ms. Key felt that she had been discriminated</p> <p>22 against?</p> <p>23 A. Phoned me? I believe this is saying that</p> <p>24 she phoned Ms. Williams.</p> <p>25 Q. All right. And how did you come to learn</p> <p>039:01 that she phoned -- and who is Ms. Williams, by the</p> <p>02 way?</p> <p>03 A. She would be the HEA person.</p> <p>04 Q. So Ms. Williams worked for Hyundai?</p> <p>05 A. I believe -- I guess that would be like a</p> <p>06 contractor, you know, a splinter of Hyundai. I'm</p> <p>07 not sure exactly, but you have HMMA, HEA and then</p> <p>08 Dynamic.</p> <p>09 Q. And Ms. Williams is the person who had you</p> <p>10 removed from the Hyundai facility?</p> <p>11 A. Yes.</p> <p>12 Q. So she's somebody who would have the power</p> <p>13 to remove employees from Hyundai?</p> <p>14 A. If she requested it.</p> <p>15 Q. Okay. So how did you learn that Ms. Howell</p> <p>16 called Ms. Williams to report that Ms. Key felt she</p> <p>17 had experienced discrimination?</p> <p>18 A. What happened at that point is</p>
16	039:23 - 040:02	<p>039:23 THE DEPONENT: Okay. If Ms. Williams</p> <p>24 received a complaint with a security officer</p> <p>25 or a Dynamic employee, she would inform me,</p> <p>040:01 and I would have to take care of it and find</p> <p>02 out about what's going on.</p>
17	040:04 - 040:18	<p>040:04 Q. All right. Do you recall what, if anything,</p> <p>05 Ms. Williams expressed to you about the key -- the</p> <p>06 complaint Ms. Key had relayed to Ms. Howell?</p> <p>07 MR. REDMOND: Object to the hearsay.</p> <p>08 THE DEPONENT: Now, without -- I don't</p>

		<p>09 know if this would be an objection, but</p> <p>10 without looking at this memo --</p> <p>11 BY MS. LEONARD:</p> <p>12 Q. That's okay. And I'll ask first if you</p> <p>13 remember and then after that, if you need to look</p> <p>14 at the memo.</p> <p>15 A. Yeah. Once again, without reading that, I</p> <p>16 didn't remember anything of this nature, to be</p> <p>17 honest, about everything about Hyundai in Alabama,</p> <p>18 I'm sorry.</p>
18	041:15 - 041:19	<p>041:15 Q. But what you do know is at some point on the</p> <p>16 morning of August 1, 2017, Carolyn Williams from</p> <p>17 Hyundai told you that Ms. Key was complaining of</p> <p>18 discrimination, correct?</p> <p>19 A. That is correct.</p>
19	042:03 - 042:14	<p>042:03 Q. And after Ms. Williams made you aware that</p> <p>04 Ms. Key had voiced concerns that she was</p> <p>05 experiencing discrimination, you had Ms. Key</p> <p>06 brought into a meeting with you and Maurice</p> <p>07 Chambliss, correct?</p> <p>08 A. That's correct.</p> <p>09 Q. Who is Maurice Chambliss?</p> <p>10 A. He would have been her immediate supervisor</p> <p>11 because I would no longer be the supervisor.</p> <p>12 Q. When you say her immediate supervisor, are</p> <p>13 you referring to Ms. Key?</p> <p>14 A. Oh, I'm sorry. Ms. Key, uh-huh, Ms. Key.</p>
20	045:11 - 045:16	<p>045:11 Q. Okay. Did you do anything else to</p> <p>12 investigate Ms. Key's complaint of discrimination?</p> <p>13 A. Not that I'm -- not -- other than send this</p> <p>14 to Mr. Cureton, that would have been the end of my</p> <p>15 -- probably, what, investigation and then await</p> <p>16 what his determination would have been.</p>
21	045:23 - 046:25	<p>045:23 Q. When did you send your memo to Mr. Cureton?</p> <p>24 A. This looks like on August 1st.</p> <p>25 Q. Did you send this memo -- well, did</p> <p>046:01 Mr. Chambliss call you after he took Ms. Key to the</p> <p>02 mail room and tell you that Ms. Key wanted to file</p> <p>03 a complaint of discrimination against you and</p> <p>04 Cassandra Williams because of hair?</p> <p>05 MR. REDMOND: Objection to the hearsay.</p> <p>06 THE DEPONENT: Let me go back here.</p>

		<p>07 Yes. I see that in here, uh-huh, because of</p> <p>08 her hair and who she should talk to, uh-huh.</p> <p>09 BY MS. LEONARD:</p> <p>10 Q. So on the morning of August 1st before you</p> <p>11 prepared a statement to send to Dynamic Security,</p> <p>12 you heard from Latonya Howell through Cassandra</p> <p>13 Williams that Ms. Key was complaining of</p> <p>14 discrimination. You heard from Ms. Key in a</p> <p>15 meeting with her, and then you heard again from</p> <p>16 Maureen Chambliss that Ms. Key wanted to file a</p> <p>17 complaint of discrimination against you and</p> <p>18 Cassandra Williams of Hyundai because of hair?</p> <p>19 MR. REDMOND: Object to the hearsay and</p> <p>20 to the compound nature of the question.</p> <p>21 BY MS. LEONARD:</p> <p>22 Q. You can answer.</p> <p>23 A. Okay. So by this, I told him to have</p> <p>24 Ms. Key depart the site and report to Ray Cureton</p> <p>25 with her complaint.</p>
22	047:14 - 047:18	<p>047:14 Q. Sure. My question is, you would agree that</p> <p>15 at least from your meeting with Ms. Key --</p> <p>16 A. Okay.</p> <p>17 Q. -- it suggested that she wanted to complain</p> <p>18 about discrimination because of hair, correct?</p>
23	047:24 - 048:25	<p>047:24 A. She wanted to complain about discrimination.</p> <p>25 I can definitely agree with that, yes.</p> <p>048:01 Q. And you would agree that after you met with</p> <p>02 Ms. Key, you get a call from Maurice Chambliss who</p> <p>03 says that Ms. Key wants to file a formal complaint</p> <p>04 because of hair discrimination, correct?</p> <p>05 A. He said that by this, wanted to file the</p> <p>06 complaint, yes. And I informed him that he needed</p> <p>07 to have her contact Mr. Cureton, you know,</p> <p>08 Dr. Cureton at that time.</p> <p>09 Q. What, if anything else, did you do after</p> <p>10 Mr. Chambliss told you that Ms. Key wanted to</p> <p>11 complain of discrimination about her hair?</p> <p>12 A. This would probably be it, send up this memo</p> <p>13 to Mr. Cureton, because at that point in time I</p> <p>14 knew that was beyond me.</p> <p>15 Q. After you sent this August 1st memo to</p> <p>16 Mr. Cureton, did anybody from Dynamic Security ask</p>

		<p>17 you anything else about Davita Key?</p> <p>18 A. Not that I'm aware of, no. I don't</p> <p>19 remember, I'll put it to you that way.</p> <p>20 Q. Okay. Did anyone from Dynamic Security ask</p> <p>21 you if you had made a remark to Ms. Key along the</p> <p>22 lines that the Koreans were a different breed of</p> <p>23 animals and that they send little memos and they</p> <p>24 don't want African-Americans wearing their hair in</p> <p>25 dreadlocks because of the clientele they have?</p>
24	049:02 - 049:02	049:02 THE DEPONENT: Not that I'm aware of.
25	049:14 - 050:01	<p>049:14 Q. Do you have any memory of Sherry Spires or</p> <p>15 Ray Cureton asking you any questions about</p> <p>16 Ms. Key's complaint of discrimination?</p> <p>17 A. I don't even know who Sherry Spires is, but</p> <p>18 no, not that I'm aware of.</p> <p>19 Q. Okay. Have you seen any of the written</p> <p>20 complaints that Ms. Key submitted to Dynamic</p> <p>21 Security?</p> <p>22 A. No.</p> <p>23 Q. Did anyone from Dynamic Security present you</p> <p>24 with any of the written complaints that Ms. Key</p> <p>25 made to get your side of the story?</p> <p>050:01 A. No.</p>
26	050:03 - 050:07	<p>050:03 Did Dynamic Security give you the option of</p> <p>04 placing Ms. Key in any available positions at the</p> <p>05 Hyundai plant?</p> <p>06 A. I don't remember talking about this</p> <p>07 whatsoever.</p>

Case	Key Depositions - Trial
Issue Code	Trial exam

ROBINSON, GLORIA 3/20/23 VOL 1		
1	009:01 - 009:16	<p>009:01 Q. What involvement would you have with placing</p> <p>02 employees at positions other than at the Hyundai</p> <p>03 facility when you were working for Dynamic?</p> <p>04 A. At that time, it would be just Glovis and</p> <p>05 Hyundai.</p> <p>06 Q. And what involvement would you have with</p> <p>07 placing employees who had been removed from the</p> <p>08 Hyundai facility in terms of finding them other</p> <p>09 employment if they had been removed from the</p> <p>10 Hyundai facility?</p> <p>11 A. Now, they would go back to the office. If</p> <p>12 they weren't going to be working at Hyundai, they</p> <p>13 could go back to Dynamic's main office -- I forgot</p> <p>14 where it was -- and find another spot because</p> <p>15 Dynamic did have other posts in areas where they</p> <p>16 could work, people could work.</p>
2	010:14 - 010:21	<p>010:14 Q. Will you repeat that last question for us?</p> <p>15 A. That was concerning people leaving Hyundai</p> <p>16 and going back to the office?</p> <p>17 Q. Yes, I think my question was, what</p> <p>18 involvement would you have in placing employees who</p> <p>19 had been removed from the Hyundai facility into</p> <p>20 other positions or locations?</p> <p>21 A. I would have no involvement.</p>
3	011:24 - 012:04	<p>011:24 Q. Okay. What was the answer you were giving?</p> <p>25 And I'm not asking you about the details. I'm just</p> <p>012:01 asking, are you aware that Ms. Key was at some</p> <p>02 point removed from the Hyundai facility?</p> <p>03 A. Well, I didn't remember the -- (audio</p> <p>04 distortion).</p>